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FIRST GENERAL COUNSEL'S REPORT

MUR: 6435

DATE COMPLAINT FILED: 11/29/10

DATE OF NOTIFICATION: 12/2/10

DATE OF LAST RESPONSE: 4/5/11

DATE ACTIVATED: 1/28/11

ELECTION CYCLE: 2010

EXPIRATION OF SOL: 1/5/14 – 9/14/15

COMPLAINANT:

National Legal and Policy Center

RESPONDENTS:

Representative Charles B. Rangel

National Leadership PAC and David A. Paterson, in his
official capacity as treasurer¹

Rangel for Congress and David A. Paterson, in his official
capacity as treasurer

**RELEVANT STATUTES
AND REGULATIONS:**

52 U.S.C. § 30101(8)(A)(i)²

52 U.S.C. § 30102(e)(2)

52 U.S.C. § 30104(b), (i)(8)(B)

52 U.S.C. § 30116(a)(2)(A), (f)

11 C.F.R. § 100.5(e)(6)

11 C.F.R. § 100.52(a), (d)(1)

11 C.F.R. § 104.13(a)(2)

11 C.F.R. § 110.2(b)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

¹ David A. Paterson became treasurer of the National Leadership PAC on July 9, 2014, and the treasurer of Rangel for Congress on May 1, 2014. *See* National Leadership PAC Amended Statement of Organization (July 9, 2014); Rangel for Congress Amended Statement of Organization (May 1, 2014).

² On September 1, 2014, the Federal Election Campaign Act of 1971, as amended ("the Act"), was transferred from Title 2 of the United States Code to new Title 52 of the United States Code.

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1 **I. INTRODUCTION**

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3 The complaint alleges that the National Leadership PAC ("NLP"), Representative
4 Charles B. Rangel's leadership PAC, impermissibly paid \$393,000 for legal services provided to
5 Rangel in connection with an investigation of his conduct by the U.S. House of Representatives
6 Committee on Ethics ("House Ethics Committee"). Although Rangel's principal campaign
7 committee, Rangel for Congress ("RFC" or "Rangel Committee") had directly paid for its own
8 legal fees totaling \$1,669,725, the complaint alleges that the \$393,000 paid by NLP was an
9 unreported excessive in-kind contribution to Rangel and RFC.³ In response, NLP asserts that it
10 incurred its own fees in connection with the House Ethics Committee investigation and other
11 investigations conducted by the Federal Election Commission and the Department of Justice. It
12 therefore denies the allegations and asserts that the \$393,000 in legal fees were not RFC's
13 obligation. The response further argues that the matter should be dismissed because the
14 complaint is speculative and without any factual basis.

15 After reviewing the complaint, the responses and other available information, we
16 recommend that the Commission dismiss the allegations that the National Leadership PAC and
17 David A. Paterson in his official capacity as treasurer violated 52 U.S.C. §§ 30116(a)(2)(A) and
18 30104(b) (formerly 2 U.S.C. §§ 441a(a)(2)(A) and 434(b)); dismiss the allegations that Rangel
19 for Congress and David A. Paterson in his official capacity as treasurer violated 52 U.S.C.
20 §§ 30116(f) and 30104(b) (formerly 2 U.S.C. §§ 441a(f) and 434(b)); dismiss the allegation that
21 Representative Charles B. Rangel violated 52 U.S.C. § 30116(f) (formerly 2 U.S.C. §§ 441a(f)),
22 approve the attached Factual and Legal Analysis, and close the file.

³ See 52 U.S.C. §§ 30116(a)(2)(A), (f) and 30104(b) (formerly 2 U.S.C. §§ 441a(a)(2)(A), 441a(f), and 434(b)).

1 **II. FACTS**

2 Congressman Charles B. Rangel represents New York's 15th Congressional District in the
3 U.S. House of Representatives. Rangel for Congress is Rangel's principal campaign committee.⁴
4 Rangel is also the sponsor of NLP, a multicandidate leadership PAC.⁵

5 On September 24, 2008, the U.S. House of Representatives Committee on Ethics ("House
6 Ethics Committee") established an investigative subcommittee to determine whether Rangel
7 violated the House's Code of Official Conduct or other law, regulation or standard of conduct
8 applicable to the performance of his official duties.⁶ The Statement of Alleged Violation,
9 adopted on June 17, 2010, contained thirteen counts relating to: Rangel's use of official
10 resources to solicit and accept donations to the Rangel Center for Public Service at the City
11 College of New York; his failure to pay taxes on a villa in the Dominican Republic; his failure to
12 comply with House financial disclosure and administrative rules; and, his lease of a rent-
13 stabilized apartment in the Lenox Terrace complex, which was jointly occupied by RFC and

⁴ See 52 U.S.C. §§ 30101(5), (6) and 30102(e)(1) (formerly 2 U.S.C. §§ 431(5) & (6) and 432(e)(1)).

⁵ See NLP Amended Statement of Organization (July 9, 2014). A leadership PAC is a political committee that is directly or indirectly established, financed, maintained or controlled by a candidate or an individual holding federal office, but is not an authorized committee of the candidate or officeholder and is not affiliated with an authorized committee of a candidate or officeholder. 52 U.S.C. § 30104(i)(8)(B) (formerly 2 U.S.C. § 434(i)(8)(B)), 11 C.F.R. § 100.5(e)(6); *see also* 11 C.F.R. § 100.5(g)(5). Generally, leadership PACs are formed by individuals who are Federal officeholders or candidates to raise funds that they in turn contribute "to other Federal candidates to gain support when the officeholder seeks a leadership position in Congress, or are used to subsidize the officeholder's travel when campaigning for other Federal candidates. The monies may also be used to make contributions to party committees, including State party committees in key states, or donated to candidates for State and local office." Notice of Proposed Rulemaking on Leadership PACs, 67 Fed. Reg. 78753, 78754 (Dec. 26, 2002).

⁶ See Statement of the Acting Chairman and Ranking Republican Member of the Committee on Standards of Official Conduct (Sept. 24, 2008), *available at* http://ethics.house.gov/sites/ethics.house.gov/files/documents/Press_Statement_Rangel_2008.pdf. On October 8, 2009, the House Ethics Committee voted to expand the jurisdiction of the investigative subcommittee's inquiry to include the examination of Rangel's 2009 Financial Disclosure Statements. See Statement of the Acting Chairman and Ranking Republican Member of the Committee on Standards of Official Conduct (Oct. 8, 2009), *available at* http://ethics.house.gov/sites/ethics.house.gov/files/documents/Rangel_Press_Statement_Oct_8_2009.PDF.

1 NLP for over 10 years ("Lenox Terrace matter").⁷ The House Ethics Committee's 21-month
2 investigation involved formal interviews of 41 witnesses, informal interviews of other witnesses,
3 the review of 28,000 documents, and 60 investigative subcommittee meetings. At least 6 of
4 these interviews were in connection with the Lenox Terrace matter, including 2 interviews with
5 RFC and NLP staff.⁸ On December 2, 2010, the U.S. House of Representatives voted to censure
6 Representative Rangel for eleven violations of the House Ethics rules, including his lease of the
7 rent-stabilized apartment that RFC shared with NLP.⁹

8 On June 24, 2009, the House Ethics Committee also launched an inquiry into the
9 sponsorship of travel costs for several members of Congress, including Rangel, to Carib News
10 Foundation Business Conferences in Antigua in 2007 and St. Maarten in 2008.¹⁰ On February
11 25, 2010, the House Ethics Committee publicly admonished Rangel for violating the House gift
12 rule by accepting payment of reimbursement to the Carib News conferences in 2007 and 2008.¹¹

13 In the same time period that the Ethics Committee was investigating Rangel, the
14 Commission was considering and then later investigating MUR 6040, concerning the Lenox
15 Terrace matter, in which NLP, RFC, and Rangel were respondents. As respondents, they

⁷ See Report in the Matter of Charles B. Rangel (Nov. 29, 2010) ("Committee Report"), Attachment II: Statement of Alleged Violation ("Statement of Alleged Violation"), available at <http://ethics.house.gov/committee-report/matter-representative-charles-b-rangel>.

⁸ See Committee Report, at Appendix B and Exhibits Parts 11 and 12.

⁹ See H.R. Res. 7891, 111th Cong. (2009-2010), available at <http://clerk.house.gov/evs/2010/roll607.xml>.

¹⁰ See Report on Investigation Into Officially Connected Travel of House Members to Attend the Carib News Foundation Multi-National Business Conferences in 2007 and 2008 (Feb. 25, 2010) ("Carib News Report"), available at <http://ethics.house.gov/sites/ethics.house.gov/files/documents/Carib%20News%20Report%20Vol.%201.pdf>.

¹¹ See Carib News Report at IV-V.

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Between October 1, 2008, and August 16, 2010, RFC paid legal fees totaling \$1,669,725 to two law firms — Orrick, Herrington & Sutcliffe LLP (“Orrick”) and Zuckerman, Spaeder LLP (“Zuckerman”) — for legal representation, as shown in the chart below.

¹² See, e.g., Rangel, *et al.*, RTB Resp. (MUR 6040).

¹³ See Charles B. Rangel Designation of Counsel (Mar. 11, 2009).

¹⁴ Conciliation Agreement ¶¶ IV.12 & V, MUR 6040 (Rangel, *et al.*).

15 **Resp. at 3.**

16 *Id.*

17 *Id.*

RFC Payments for Legal Services			
Year	Law Firm	Committee	Amount
2008	Orrick, Herrington & Sutcliffe	Rangel for Congress	\$ 121,436.63
2009	Orrick, Herrington & Sutcliffe	Rangel for Congress	\$ 100,000.00
	Zuckerman Spaeder	Rangel for Congress	\$1,166,288.58 ¹⁸
2010	Zuckerman Spaeder	Rangel for Congress	\$ 282,000.00
		TOTAL	\$1,669,725.00

Between January 5, 2009 and September 14, 2010, NLP also paid a total of \$393,000 to Orrick and Zuckerman for legal representation, as shown in the chart below.

NLP Payments for Legal Services			
Year	Law Firm	Committee	Amount
2009	Orrick, Herrington & Sutcliffe	National Leadership PAC	\$100,000.00
2010	Zuckerman Spaeder	National Leadership PAC	\$293,000.00
		TOTAL	\$393,000.00

III. LEGAL ANALYSIS

The complaint alleges that Respondents violated the Act when NLP made an excessive unreported in-kind contribution to Rangel and RFC by paying for legal services provided to Rangel and RFC.¹⁹ In a joint response, respondents deny the allegation and assert that the legal fees paid by NLP were exclusively for legal services provided to NLP.²⁰ The response also argues that the complaint should be dismissed because it is speculative and offers no facts or

¹⁸ The Complaint erroneously asserts that RFC paid Zuckerman only \$711,407.37 in 2009.

¹⁹ Compl. at 4, 6.

²⁰ Resp. at 1.

1 sources of information to support a reason to believe finding other than listing disbursements the
2 committees made to law firms.²¹

3 Under the Act, NLP may make contributions to candidates up to \$5,000 per election.²² A
4 contribution includes any gift, subscription, loan, advance, or deposit of money or anything of
5 value, including "in-kind contributions," made by any person for the purpose of influencing a
6 federal election.²³ Leadership PACs are not allowed to provide support to the Federal candidate
7 or officeholder with whom they are associated in amounts different than those available to other
8 similar committees.²⁴ To the extent that a leadership PAC is used to pay for costs that could and
9 should otherwise be paid for by a candidate's authorized committee, such payments are in-kind
10 contributions, subject to the Act's contribution limits and reporting requirements.²⁵ Thus, if NLP

²¹ In support of its argument, the response cites to 11 C.F.R. § 111.4(d)(3) (stating that a complaint "should contain a clear and concise recitation of the facts which describe a violation") and the Statement of Reasons of Commissioners Mason, Sandstrom, Smith and Thomas in MUR 4960 (Hillary Rodham Clinton for US Senate Exploratory Committee). Resp. at 2-3.

²² 52 U.S.C. § 30116(a)(2)(A) (formerly 2 U.S.C. § 441a(a)(2)(A)); 11 C.F.R. § 110.1(d) (setting a \$5,000 per election contribution limit for unauthorized multicandidate committees.)

²³ 52 U.S.C. § 30101(8)(A)(i) (formerly 2 U.S.C. § 431(8)(A)(i)), 11 C.F.R. § 100.52(d)(1). See 52 U.S.C. § 30101(8) (formerly 2 U.S.C. § 431(8)) (defining contribution as "any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office" or "the payment by any person of compensation for the personal services of another person which are rendered to a political committee without charge for any purpose.").

²⁴ See Final Rule and Explanation and Justification, Leadership PACs, 68 Fed Reg. 67013, 67016 (Dec. 1, 2003).

²⁵ *Id.* at 67017. See, e.g., MUR 5181 (Ashcroft) (the acceptance by an authorized committee of a fundraising mailing list developed by the candidate's leadership PAC was an excessive in-kind contribution). The Commission has never specifically considered whether a leadership PAC can pay for legal representation of the PAC's sponsor in connection with an ethics investigation of the sponsor. The Commission allows the use of campaign funds by a Federal officeholder or candidate to pay legal fees in connection with a House Ethics Committee inquiry or investigation; the Commission has said that such legal fees are ordinary and necessary expenses that would not exist irrespective of the officeholder's official duties. See Advisory Op. ("AO") 2006-35 (Kolbe), AO 1998-01 (Hilliard), AO 2008-07 (Vitter) and AO 2009-12 (Coleman). Thus, because a candidate is permitted to use funds of his or her authorized committee for such inquiries, it appears that the candidate's leadership PAC is prohibited from paying such costs. However, because we conclude that the available information does not support the complaint's inference that the payments made by NLP were for legal services provided to Rangel and his authorized campaign committee, this Report does not address this issue, and the Commission likewise need not reach the issue.

1 paid for legal services that were actually provided to the Rangel Committee and the payments
2 exceed \$5,000, NLP violated section 30116 (formerly 441a(a)(2)(A)) by making an excessive in-
3 kind contribution to RFC and Rangel, and Rangel and RFC violated 52 U.S.C. § 30116(f)
4 (formerly 2 U.S.C. § 441a(f)) by knowingly accepting contributions in excess of the Act's
5 limits.²⁶ Further, the Act requires that all political committees file reports disclosing all
6 contributions made and received, and thus to the extent that any in-kind contributions from NLP
7 to the Rangel Committee were not reported by either committee, each committee would have
8 violated the Act's reporting requirements.²⁷

9 The available record, however, "does not provide a basis for proceeding with the matter"
10 because "it fails to give rise to a reasonable inference that a violation occurred."²⁸ The
11 complaint's allegation that NLP's payments of \$393,000 for legal fees benefitted the Rangel
12 Committee is speculative and directly denied by the respondents, who refute the complaint's
13 inferences by providing a detailed explanation of the issues and matters for which the NLP
14 received the legal services at issue. Further, the inferences on which the allegations are based,
15 rest almost exclusively on the complainant's own subjective evaluation of NLP's relative
16 importance in the House Ethics Committee's investigation, the perceived significance of the
17 timing of the payments, and its judgment about what amount of legal expenses is appropriate for
18 NLP, as compared to those paid by RFC. Specifically, the complaint argues that "[t]he fact that
19 the [NLP] paid \$293,000 to Rep. Rangel's principal law firm in 2010 compared to the smaller

²⁶ NLP did not disclose making any direct or in-kind contributions to the Rangel Committee during the 2010 election cycle, nor did the Rangel Committee report receiving any contributions from NLP.

²⁷ 52 U.S.C. § 30104(b) (formerly 2 U.S.C. § 434(b)). In-kind contributions must be reported as both contributions received and expenditures made. 11 C.F.R. §§ 104.3(b), 104.13(a)(2).

²⁸ See Statement of Policy Regarding Commission Action in Matters at the Initial Stage in the Enforcement Process, 72 Fed. Reg. 12,545, 12,546 (Mar. 16, 2007) ("Statement of Policy").

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1 amount of \$282,000 paid to the same law firm by Rangel for Congress in the same year is a key
2 fact in demonstrating that Rep. Rangel improperly paid his law firm in a major way throughout
3 2010.”²⁹ It rejects the defense that NLP paid for legal services in connection with inquiries that
4 it had received in connection with the House Ethics investigation by noting that NLP was
5 implicated in only one of 13 allegations and only 7 of 273 numbered paragraphs of the Statement
6 of Alleged Violation issued by the Ethics Committee. The complaint argues that NLP had too
7 small a role in the investigation to generate such large legal fees, and points out that the House
8 Ethics Committee had no jurisdiction over NLP and was unable to impose any sanctions or
9 penalties on it.³⁰ Accordingly, the complaint deems NLP’s payments in 2009 to Orrick as
10 “extremely out of proportion,” and its 2010 payments to Zuckerman as “wildly out of
11 proportion.”³¹ The complaint further suggests that RFC’s financial pressures during the election
12 year of 2010 caused Rangel to turn to NLP that year to pay \$293,000 in legal fees owed
13 Zuckerman.³² The complaint, without citing to any direct evidence, thus infers that at least some
14 part of the services paid for by NLP must have been for legal services actually provided to
15 Rangel and his authorized Committee.³³

16 In a single joint response, however, respondents unequivocally deny the allegation by
17 stating, “the legal fees paid by NLP were for legal services it incurred on its own behalf relating

²⁹ Compl. at 4.

³⁰ *Id.* at 7-8.

³¹ *Id.* at 8.

³² *Id.* at 9. The complaint also acknowledges that Oldaker has provided legal services to both committees, but states that because NLP paid legal fees to Oldaker during the pendency of the House Ethics Committee investigation, it is “likely” that a portion of those disbursements were also “improper.” Compl. at 5.

³³ *Id.*

1 to the House Ethics Committee investigation, other ongoing legal proceedings and generally
2 heightened compliance efforts."³⁴ Respondents further explain the scope of the payments,
3 explaining that, although it was not a target of the House Ethics Committee investigation, "NLP,
4 in particular, incurred significant legal expenses because it shared campaign staff and office
5 space with RFC, and Mr. Rangel's close association with NLP required it to frequently conduct
6 due diligence in order to provide comprehensive responses to investigators questions as well as
7 questions posed by Mr. Rangel and RFC."³⁵ The response specifically points to MUR 6040 and
8 a Department of Justice investigation relating to Rangel's travel to the Carib News Foundation's
9 business conferences, for which NLP was required to provide information to Department of
10 Justice investigators, as other concurrent matters for which NLP had obligations and interests.³⁶
11 In sum, the response observed that the "intense scrutiny to which Mr. Rangel has been subjected
12 since 2008 has required a higher level of legal review."³⁷ Documents released by the House
13 Ethics Committee show that NLP was involved in the investigations, independently
14 corroborating the NLP's assertions that it incurred its own legal expenses in connection with the
15 inquiry into the Lenox Terrace matter and the government's investigation of the Carib News
16 Foundation.³⁸ Thus, the available information sufficiently establishes that NLP has its own legal

³⁴ Resp. at 4. We note that this denial is consistent with a statement reportedly made by a Rangel spokesman regarding the \$100,000 payment that NLP made to Orrick in 2009 — the complaint references a news article published approximately four months after NLP reported its \$100,000 payment to Orrick (and prior to any disbursements to Zuckerman) which states: "It was not for a personal matter," Rangel spokesman Emile Milne said in an email to POLITICO. "The \$100,000 paid to the law firm of Orrick, Herrington & Sutcliffe, LLP was for legal services the firm provided to National Leadership PAC ('NLP') in relation to inquiries concerning NLP's office space in New York." Compl. at 7.

³⁵ Resp. at 3.

³⁶ *Id.*

³⁷ *Id.* at 2-3.

³⁸ See, e.g., Carib News Report, at Appendix D.

1 exposure and that it had significant ongoing obligations due to its status as a witness in ongoing
2 legal proceedings.

3 Indeed, the complaint itself concedes that NLP had its own legal expenses, and merely
4 argues that the amount of fees paid to the law firms is disproportionate with the amount of
5 representation that it deemed necessary given NLP's potential liability. In making this argument,
6 however, the complaint artificially links the number of paragraphs in the final Statement of
7 Alleged Violations that implicate NLP, to the amount spent by NLP on services, an approach
8 which seems overly simplistic and fails to recognize that the House Ethics Committee's
9 investigation of Rangel was wide-ranging in scope, spanned several years, and involved more
10 than one issue implicating NLP. Further, in making its allegations that the legal expenses paid
11 by NLP were out of proportion with those paid by RFC, the Complaint fails to include
12 \$454,881.21 in legal expenses paid by RFC in its calculation.³⁹ Of the \$2,062,725 paid to Orrick
13 and Zuckerman between 2008 and 2010, NLP paid only \$393,000, or 19% of the total. Further,
14 although the complaint accurately observes that RFC paid all legal fees in 2009 but shared fees
15 with NLP in 2010 in an election year when RFC perhaps was sheltering funds for campaign uses,
16 this sequencing information falls short of providing a basis to commence an investigation into
17 over \$2,000,000 in transactions when the overall allocation of fees appears to be reasonable and
18 the complaint itself acknowledged that some allocation was appropriate.⁴⁰

³⁹ See *supra* n.22.

⁴⁰ While the response fails to give specific details about the dates that NLP retained the firm, the length of the engagement or the specific tasks completed, and provided no invoices or other documentation to support its response — when invited to clarify their response, Respondents declined to voluntarily provide this Office with such additional details in a letter dated April 5, 2011, *see* letter from the Oldaker Law Group, LLP (Apr. 5, 2011) — in light of the speculative nature of the complaint's allegation, the facts provided are sufficient and specific enough to rebut the complainant's allegations. *Cf.* MUR 6023 (McCain) Factual and Legal Analysis at 10-12, citing MUR 5736 (Friends for Mike McGavick) First Gen. Counsel's Rpt. (Nov. 22, 2006) (the Commission found that while the responses to the complaint were not factually complete, the complaint, which alleged that the candidate's employer

1 In short, the allegations in the complaint seem to lack sufficient facts to contradict the
2 respondents' contentions that the legal fees paid by the National Leadership PAC were for
3 services provided to the National Leadership PAC. While one could speculate, based on the
4 timing of the payments, that the payments by the National Leadership PAC were made to pay for
5 fees incurred by the Rangel Committee, the complaint provides no specific facts to support such
6 speculation. Weighing the speculative allegation in the complaint against the categorical denial
7 in the response, we recommend that the Commission dismiss this matter pursuant to the exercise
8 of their prosecutorial discretion based on the weakness of the circumstantial information
9 provided in the complaint.⁴¹

10 For all the reasons outlined above, this Office does not believe this matter merits the
11 further use of Commission resources into identifying what allocation of costs was appropriate.

altered the terms of his employment agreement that in turn resulted in lucrative benefits for the candidate, failed to provide sufficient facts to warrant an investigation) and MUR 5701 (Bob Filner for Congress) First Gen. Counsel's Rpt. (July 10, 2006) at 5, (finding allegations and available information did not warrant an investigation where the respondent provided "sufficient and specific facts to rebut the complainant's allegations" that a business run by the candidate's spouse was a "sham"). See also Statement of Reasons, Comm'rs. Mason, Sandstrom, Smith and Thomas at 2-3 (MUR 4960) (Hillary Rodham Clinton for US Senate Exploratory Committee) (stating that "[u]nwarranted legal conclusions from asserted facts . . . or mere speculation . . . will not be accepted as true," and "[s]uch speculative charges, especially when accompanied by direct refutation, do not form an adequate basis to find reason to believe that a violation of FECA has occurred").

⁴¹ The Commission's *Statement of Policy Regarding Commission Action in matters at the Initial Stage of the Enforcement Process* states that the Commission will dismiss a matter pursuant to its prosecutorial discretion "when the matter does not merit further use of Commission resources, due to factors such as the small amount or significance of the alleged violation, the vagueness or weakness of the evidence, or likely difficulties with an investigation." 72 FR 12546 (March 16, 2007).

Accordingly, this Office recommends that the Commission exercise its prosecutorial discretion and dismiss this matter and close the file.

IV. RECOMMENDATIONS

1. Dismiss the allegations that the National Leadership PAC and David A. Paterson in his official capacity as treasurer violated 52 U.S.C. §§ 30116(a)(2)(A) and 30104(b) (formerly U.S.C. §§ 441a(a)(2)(A) and 434(b)).
2. Dismiss the allegations that Rangel for Congress and David A. Paterson in his official capacity as treasurer violated 52 U.S.C. §§ 30116(f) and 30104(b) (formerly 2 U.S.C. §§ 441a(f) and 434(b)).
3. Dismiss the allegation that Representative Charles B. Rangel violated 52 U.S.C. § 30116(f) (formerly 2 U.S.C. § 441a(f)).
4. Approve the attached Factual and Legal Analysis.
5. Approve the appropriate letters.
6. Close the file.

Date

9-30-14

Kathleen Guith
Deputy Associate General Counsel
For Enforcement

Peter G. Blumberg

Peter G. Blumberg
Assistant General Counsel

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